

From: Mark Loevy-Reyes <mark@loevy.com>

Sent: Friday, July 17, 2020 12:05 PM

To: LaGrassa, Adam <ALaGrassa@lowellma.gov>

Cc: Tara Thompson <tara@loevy.com>; Renee Spence <spence@loevy.com>; Steve Art <steve@loevy.com>; Margaret Cunliffe <margaret@loevy.com>; Melisa Topic <melisa@loevy.com>; Monica Fuentes <monica@loevy.com>; Brown, Rachel <rbrown@lowellma.gov>; burkejared@gmail.com; Moeser, Stacie <SMoeser@lowellma.gov>; O'Connor, Christine <CO'Connor@lowellma.gov>; Hucksam Jr, John R. <jhucksam@lowellma.gov>; Gettings, Celine <cgettings@lowellma.gov>; Jenness, Kerry <KJenness@lowellma.gov>

Subject: Re: Rosario v. Waterhouse, et al. - Notice of Depositions

Of course, Adam. I would point out that the notice of deposition identifies the depositions as being taken remotely. But we can definitely discuss the logistics. I am free on Monday or Tuesday.

On Fri, Jul 17, 2020 at 11:52 AM LaGrassa, Adam <ALaGrassa@lowellma.gov> wrote:

Mark—

Can we find a time to discuss the depositions next week? Given that the individual defendants are all very high risk for exposure to COVID 19 based on their age and various health conditions, we are interested in discussing, among other things, how you anticipate conducting the depositions in a way that will take those concerns into account.

Please let us know your availability.

Thanks,

Adam R. LaGrassa | Assistant City Solicitor

City of Lowell - Law Department

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From: Monica Fuentes <monica@loevy.com>

Sent: Friday, July 17, 2020 11:36 AM

To: Brown, Rachel <rbrown@lowellma.gov>; LaGrassa, Adam <ALaGrassa@lowellma.gov>; burkejared@gmail.com; Moeser, Stacie <SMoeser@lowellma.gov>; Gettings, Celine <cgettings@lowellma.gov>; O'Connor, Christine <CO'Connor@lowellma.gov>; Hucksam Jr ,John R. <jhucksam@lowellma.gov>

Cc: Mark Loevy-Reyes <mark@loevy.com>; Tara Thompson <tara@loevy.com>; Renee Spence <spence@loevy.com>; Steve Art <steve@loevy.com>; Margaret Cunliffe <margaret@loevy.com>; Melisa Topic <melisa@loevy.com>

Subject: Rosario v. Waterhouse, et al. - Notice of Depositions

Counsel,

Please see the attached Notice of Depositions for John Guilfoyle, Wilfred Dow, Garrett Sheehan, and Harold Waterhouse. Plaintiff is flexible on the dates, but wishes to take these depositions.

Please also inform us if you are available for third party depositions on July 30, 2020 and August 6, 2020.

Best,

Monica Fuentes

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Monica Fuentes

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